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ROOTS READY MADE GARMENTS CO. W.L.L.

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

## PUBLIC VERSION

1 Plaintiff Roots Ready Made Garments Co. W.L.L. (“Roots”) submits  
 2 this Notice of Errata to correct the following citations in Roots’ Opposition to  
 3 Defendants’ Motion for Summary Judgment (“Opposition Brief”) and omissions  
 4 in the Declaration of Bradley J. Nash in Support of Plaintiff’s Opposition to  
 5 Defendants’ Motion for Summary Judgment (“Nash Declaration”):

- 6 1. In the Opposition Brief at page 1, the following sentence has an incorrect  
 7 citation: “Following a change in Gap’s management, in 2002, Gap  
 8 demanded that Solka pay immediately for the remaining inventory.”  
 9 The correct citation following this sentence is: Exh. C, 22:2-23:10.
- 10 2. In the Opposition Brief at pages 1-2, Roots inadvertently omitted citation  
 11 to a document after the sentence: “When asked whether Gabana had any  
 12 facilities in the Middle East, Solka’s principal, Jacques Fabre, who at  
 13 one point served as the President of Gabana, responded as follows: ‘A.  
 14 (Laughs). No. . . . They had an office in Geneva, but that’s all.’” A true  
 15 and correct copy of this document is attached hereto as Exhibit 1 to the  
 16 Notice of Errata.
- 17 3. In the Opposition Brief at page 2, the following sentence has an incorrect  
 18 citation: “When asked whether Mr. Larsen had any expertise selling  
 19 garments in the Middle East, Mr. Fabre was similarly unequivocal: ‘A  
 20 (Laughs). We are wasting . . . time. No.’” The correct citation  
 21 following this sentence is: Exh. C, 34:1-2.
- 22 4. In the Opposition Brief at page 2, the citation to Exhibit C after the  
 23 following sentence is incorrect: “Bell promised that in exchange for  
 24 purchasing the inventory, Roots would receive ISP rights in ‘all the  
 25 Arabic-speaking countries.’” The correct citation to Exhibit C is: Exh.  
 26 C, 30:2-3.
- 27 5. In the Opposition Brief at page 3, the citation to Exhibit F after the  
 28 following sentence is incorrect: “Jim Bell informed Roots that Gap did

- 1 not wish to make sales directly to a Middle Eastern Company.” The  
2 correct citation to Exhibit F is: Exh. F, 132:23-25.
- 3 6. In the Opposition Brief at page 5, Roots’ inadvertently cited an incorrect  
4 page number after the sentence: “In June 2003, Roots representatives,  
5 including Abu Issa, traveled to San Francisco for a Gap collection  
6 presentation.” The correct citation following this sentence is: Exh. E,  
7 196:20-22.
- 8 7. In Exhibit E to the Nash Declaration, Roots inadvertently omitted page  
9 196. A true and correct copy of page 196 to Exhibit E of the Nash  
10 Declaration is attached hereto as Exhibit 2 to the Notice of Errata.
- 11 8. In Exhibit F to the Nash Declaration, Roots inadvertently omitted page  
12 84. A true and correct copy of page 84 to Exhibit F of the Nash  
13 Declaration is attached hereto as Exhibit 3 to the Notice of Errata.

14  
15 DATED: August 13, 2008

COVINGTON & BURLING LLP

16  
17 By: /s/ Bradley J. Nash  
18 Bradley J. Nash

19 *Attorneys for Plaintiff Roots Ready*  
20 *Made Garments Co. W.L.L.*